

September 15, 2006

Bonneville Power Administration  
Public Affairs Office – DKC-7  
P.O. Box 14428  
Portland, OR 97293-4428

RE: BPA Congestion Management Recommendations

Dear Mr. Rios,

Seattle City Light (SCL) offers the following comments to Bonneville Power Administration's (BPA) on its recent proposals to address congestion. These proposals are the short and medium term tools that the Transmission Business Line (TBL) envisions will help mitigate growing transmission congestion on the Northwest transmission system. SCL supports the overall proposals presented to the Congestion Management Steering Committee, but feels strongly that the Puget Sound Area Northern Intertie (PSANI) congestion cutplane must be added to the initial within-hour reliability dispatch pilot program (Pilot Program). Ensuring reliability in this geographical cutplane is fundamental to maintaining service to the largest NW retail loads as well as preserving the critical economic vitality of the region.

This late inclusion of the PSANI cutplane into the final recommendations to the Steering Committee is not problematic and can be successful because:

- The Puget Sound area utilities have prior successful experience with reliability redispatch.
- TBL has stated that the only BPA control area generators will be included in the Pilot Program. The three Puget Sound area utilities currently operate redispatch in a manner that provides a solution to the TBL identified problem of control area transfers being out of balance.
- The Puget Sound parties would manage their own INCs and DEDs to ensure that control area transfers are not required.
- The Parties believe that the total costs for redispatch for the Puget Sound area will not cause undue pressure on the proposed \$1.0 million cap for the Pilot Program.

Inclusion of PSANI into the Pilot Program will provide the clear statement that BPA is serious about protecting Puget Sound regional loads from unfair curtailments arising out of long-term contract requirements.

SCL realizes that inclusion of the PSANI cutplane into the Pilot Program adds additional pressure to meet the timeline for implementation in 2007. Seattle is confident that this additional consideration is achievable and that BPA, the Puget Sound region and British Columbia will benefit from the addition of this cutplane into the Pilot Program.

Respectfully submitted,

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